TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

FOR

International Paper Company

Polk County

Construction Permit Application Number

1050076-009-AC

Boiler Replacement

Florida Department of Environmental Protection

Southwest District

Tampa, FL

November 20, 2006

Prepared by: Danny Stubbs

I. Project Description:

A. Applicant:

Ms. Barbara F. Empey
Environmental Health and Safey Manager
International Paper Company
525 Recker Highway
Auburndale, FL 33823

B. Engineer:

Bruce P. McLeod, P.E.
USR Corporation
5643 Bay Forest Drive
Pensacola, FL 32526

C. Project and Location:

The proposed project is for the installation of a new Cleaver–Brooks Model CB-LE-200-500-250 PSIG boiler at the International Paper, Auburndale Facility. This boiler will serve to replace the old boiler (emission unit 003), which was removed and retired from service. The facility is located on 525 Recker Highway in the city of Auburndale, Polk County, Florida.

D. Process and Controls:

Emission Unit ID 008 – Process Steam Boiler (NSPS)

This emission unit consists of a Cleaver–Brooks Model CB-LE-200-500-250 PSIG boiler, used to provide process steam. The boiler has a design heat input rate of 24.2 MMBtu/hr. and is fired with natural gas as the primary fuel, and new No. 2 fuel oil as a backup. The sulfur content of new No. 2 fuel oil used by this boiler will be limited to 0.05%, by weight. At a heat input rate of 24.2 MMBtu/hr., the natural gas flow rate corresponds to approximately 24,000 cuft/hour while the new No. 2 fuel oil flow rate corresponds to approximately 173 gallons/hour. Pollutants generated by this emission unit include PM, PM10, VOC, SO2, NOx and CO. This boiler is subject to New Source Performance Standards (NSPS) Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

E. Application Information:

- Received on: 9/26/2006
- Application Complete: 10/25/2006

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N
Rule 62-212.300, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C.[1]	Y
Rule 62-212.400, Prevention of Significant Deterioration, F.A.C[2]	N
Rule 62-296.320, General Particulate Emission Limiting Standards, F.A.C[3]	Y
Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C[4]	Y
Rule 62-296.400, Stationary Source Emission Standards, F.A.C[5]	Y
Rule 62-296.500, Reasonably Available Control Technology (VOC)[6]	N
Rule 62-296.700, Reasonably Available Control Technology (PM)[7]	N
Rule 62-204.800, Standards of Performance for New Stationary Sources, F.A.C.[8] (NSPS)	Y
Rule 62-204.800, National Emission Standard for Hazardous Air Pollutants, F.A.C.[9] (NESHAPS)	Y
Chapter 62-213, Operation Permits for Major Sources of Air Pollution, F.A.C.[10]	N
Rule 62-297.310, General Compliance Test Requirements, F.A.C.[11]	Y

1. Not exempt from general permitting requirements.
2. Facility is PSD minor source.
3. Facility is a source of particulate emissions.
4. Facility is a source of VOCs, could also be a source of odor.
5. Rule 62-296.406, F.A.C. (Fossil fuel steam generation with less than 250MMBtu/hr.) .
6. Polk County is not an air quality maintenance area and is not a nonattainment area for the air pollutant ozone.
7. Polk County is not an air quality maintenance area and is not a nonattainment area for particulate matter.
8. This facility is subject to NSPS Subpart Dc.
9. Facility is subject to the area source requirements of 40 CFR 63, Subpart KK.
10. Facility is a synthetic minor non-Title V source for the pollutant VOC and total HAPs.
11. Compliance testing is required for visible emissions.

III. Summary of Emissions

Allowable Emissions

Visible shall be limited to an opacity of less than 20%. Testing shall be in accordance with EPA Methods 9.

Emissions Estimate (Tons/Year):

Description	**PM**	**PM-10**	**VOCs**	**Total HAPs**	**CO**	**SO2**	**NOx**
EU-001 Uncoated Scrap Collection System	28.9						
EU-003 Process Steam Boiler (Removed)							
EU-004 Wax Coated Scrap Collection System	0.153						
EU-005 Exterior Starch Storage Silo	0.153						
EU-006 Interior Starch Storage Silos (2)	0.23						
EU-007 Container manufacturing			49.9*	9.9*			
EU-008 Process Steam Boiler	2.5	1.74	0.57		8.73	53.76	15.14
Facility Totals	**31.9**	**1.74**	**49.9**	**9.9**	**8.73**	**53.76**	**15.14**

* Based on facility-wide limit taken by applicant.

Title V Applicability Determination
This is a synthetic minor non-Title V facility based on limitations on volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) emission potentials.

PSD Applicability Determination
This facility is a minor source as defined by the Prevention of Significant Deterioration (PSD) regulation; therefore, PSD is not applicable.

IV. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The general and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

V. Proposed Agency Action

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).